IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

VLSI TECHNOLOGY LLC,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

C.A. Nos. 6:19-cv-00254, -00255, -00256-ADA

DECLARATION OF THOMAS HERRGOTT IN SUPPORT OF INTEL CORPORATION'S MOTION TO TRANSFER VENUE WITHIN THIS DISTRICT

I, Thomas Herrgott, hereby declare as follows:

1. I am a Controller in the Corporate Planning and Reporting Group at Intel Corporation ("Intel"). In this role, I am responsible for financial forecasting and reporting for Intel's Legal, HR, Finance, and Executive Office budgets. Previously, I have served in a number of manufacturing-focused roles at Intel, most recently as Fab/Sort Manufacturing Roadmap Specialist, where I was responsible for long-range capacity and capital investment strategy for all of Intel's fab manufacturing facilities. In total, I have worked at Intel for 21 years.

2. I submit this declaration in support Intel's Motion to Transfer Venue within this District.

3. The facts set forth in this declaration are based on my own knowledge and on research conducted under my supervision and direction. If sworn as a witness to testify in this matter, I would testify to the facts as set forth herein.

4. Intel has a facility in Austin, Texas, where Intel currently employs approximately 1,700 people.

5. Intel has no facilities or corporate connections in Waco, Texas.

6. I understand that Intel employees Olga Lowe (formerly Lu), Robert Ehrlich, and Kevin Locker are named as inventors on patents asserted in these actions. Ms. Lowe works at Intel's facility in Austin, Texas and resides in Austin. Mr. Ehrlich also works at Intel's facility in Austin, Texas and resides in Round Rock, near Austin. Mr. Locker works at Intel's facility in Chandler, Arizona.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on August 14, 2019

Thomas Herrgott
Controller, General and Administrative
Intel Corporation